

Exhibit G

1	Wages, tips, other comp.	76362.00	2	Federal income tax withheld	10815.95
3	Social security wages	76200.00	4	Social security tax withheld	4724.40
5	Medicare wages and tips	76362.00	6	Medicare tax withheld	1107.25
a	Control Number	76362.00	Dept.	Corp.	Employer use only
a	001007 STU		Dept.	A	6
b Employer's name, address, and ZIP code JOHN T CLARK & SON OF BOSTON BOSTON FISH PIER STE 301 BOSTON MA 02210 Batch #00370					
b	Employer's FED ID number	04-2203684	d	Employer's SSA number	033-42-9252
7	Social security tips		8	Allocated tips	
9	Advance EIC payment		10	Dependent care benefits	
11	Nonqualified plans		12	Benefits included in box 1	750.00
13	See instructions for box 13		14	Other	
15	Stat emp.	Decoded	Penion plan	Legal rep.	Deferred comp.
e/f Employee's name, address and ZIP code STEPHEN KEEFE PO BOX 726 GREEN HARBOR MA 02041					
16	State Employer's state ID no.	MA 042-203-684*09*	17	State wages, tips, etc.	76362.00
18	State income tax	3939.40	19	Locality name	
20	Local wages, tips, etc.		21	Local income tax	

W-2 Employee's Reference Copy
Statement
2000
OMB No. 1545-0046

2000 W-2 and EARNINGS SUMMARY

This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

1 The following information reflects your final 2000 pay stub plus any adjustments submitted by your employer.

Gross Pay	76362.00	Social Security Tax Withheld	4724.40	MA State Income Tax	18939.40
Fed. Income Tax Withheld	10815.95	Medicare Tax Withheld	1107.25	Box 18 of W-2	
Box 2 of W-2		Box 6 of W-2		Box 17 of W-2	

2 Your Gross Pay was adjusted as follows to produce your W-2 Statement.

Gross Pay	76,362.00	Wages, Tips, other Compensation	76,362.00	Medicare Wages	76,362.00	MA State Wages	76,362.00
Wages Over Limit	N/A	Box 7 of W-2		Box 5 of W-2		Box 16 of W-2	
Reported W-2 Wages	76,362.00	Box 3 of W-2		Box 6 of W-2		Box 17 of W-2	

3. Employee W-4 Profile. To change your Employee W-4 Profile Information, file a new W-4 with your payroll dept.

STEPHEN KEEFE
PO BOX 726
GREEN HARBOR MA 02041

Social Security Number: 033-42-9252
Taxable Marital Status: MARRIED
Exemptions/Allowances: FEDERAL: 2
STATE: 2

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1	Wages, tips, other comp.	13585.50	2	Federal income tax withheld	2315.70
3	Social security wages	13585.50	4	Social security tax withheld	842.30
5	Medicare wages and tips	13585.50	6	Medicare tax withheld	196.99
a	Control Number	100	Corp.	Employer use only	
a	Control Number	100	Corp.	Employer use only	145
c	Employer's name, address, and ZIP code JOHN T CLARK & SON OF BOSTON BOSTON FISH PIER STE 301 BOSTON MA 02210				
Batch #00379					
b	Employer's FED ID number	04-2203684	d	Employee's SSA number	033-42-9252
7	Social security tips		8	Allocated tips	
9	Advance EIC payment		10	Dependent care benefits	
11	Nonqualified plans		12	Benefits included in box 1	
13	See instrs. for box 13		14	Other	
15	Stat emp.	Deceased	Penalty plan	Legal rep.	Deferred comp.
e/f Employee's name, address and ZIP code STEPHEN KEEFE PO BOX 726 GREEN HARBOR MA 02041					
16	State Employer's state ID no.	MA 042-203-68409*	17	State wages, tips, etc.	13585.50
18	State income tax	734.13	19	Locality name	
20	Local wages, tips, etc.		21	Local income tax	

W-2 Wage and Tax Statement

Copy C for employee's records.

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2000 W-2 and EARNINGS SUMMARY

This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

1 The following information reflects your final 2000 pay stub plus any adjustments submitted by your employer.

Gross Pay	13585.50	Social Security Tax Withheld	842.30	MA State Income Tax	734.13
Fed. Income Tax Withheld	2815.70	Medicare Tax Withheld	196.99	Box 1 of W-2	
Box 2 of W-2		Box 6 of W-2		Box 14 of W-2	

2 Your Gross Pay Was Adjusted as follows to produce your W-2 Statement:

Gross Pay	13585.50	Wages, Tips, other Compensation	Box 1 of W-2	13585.50
Reported W-2 Wages	13585.50	Social Security Wages	Box 3 of W-2	13585.50
		Medicare Wages	Box 5 of W-2	13585.50
		MA State Wages, Tips, Etc.	Box 17 of W-2	13585.50

**STEPHEN KEEFE
PO BOX 726
GREEN HARBOR MA 02041**

Social Security Number: 033-42-9252
Taxable Marital Status: SINGLE
Exemptions/Allowances: 0
FEDERAL: 0
STATE: 0



1	Wages, tips, other comp.	76362.00	2	Federal income tax withheld	10443.60
3	Social security wages	76362.00	4	Social security tax withheld	4734.44
5	Medicare wages and tips	76362.00	6	Medicare tax withheld	1107.25
a	Control Number	001007 STJ	Dept.	Corp.	Employer use only
c	Employer's name, address, and ZIP code	JOHN T CLARK & SON OF BOSTON BOSTON FISH PIER STE 301 BOSTON MA 02210			
b	Employer's FED ID number	04-2203684	d	Employer's SSA number	033-42-9252
7	Social security tips		8	Allocated tips	
9	Advance EIC payment		10	Dependent care benefits	
11	Nonqualified plans		12a	See instructions for box 12	
14	Other		12b		
			12c		
			12d		
			13	Stat empl. plan/ind party self pay	X
e/f	Employee's name, address and ZIP code	STEPHEN KEEFE PO BOX 726 GREEN HARBOR MA 02041			
15	State/ Employer's state ID no.	MA 042-203-684*09*	16	State wages, tips, etc.	76362.00
17	State income tax	3809.01	18	Local wages, tips, etc.	
19	Local income tax		20	Locality name	

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W-2 Wage and Tax Statement **2001**

Copy C for employer's records.

2001 W-2 and EARNINGS SUMMARY



This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

1 The following information reflects your final 2001 pay stub plus any adjustments submitted by your employer.

Gross Pay	76362.00	Social Security Tax Withheld	4734.44	MA State Income Tax	3809.01
Fed. Income Tax Withheld	10443.60	Medicare Tax Withheld	1107.25	Box 17 of W-2	Box 14 of W-2
Box 2 of W-2		Box 8 of W-2			

2 Your Gross Pay was Adjusted as follows to produce your W-2 Statement.

Gross Pay	76,362.00	Wages, Tips, Other Compensation	76,362.00	Social Security Wages	76,362.00	Medicare Wages	76,362.00	MA State Wages, Tips, Etc.	76,362.00
Reported W-2 Wages		Box 1 of W-2		Box 3 of W-2		Box 5 of W-2		Box 7 of W-2	

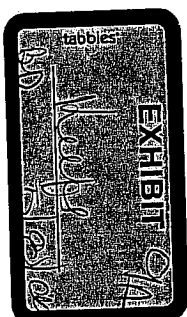
3. Employee W-4 Profile. To change your Employee W-4 Profile information, file a new W-4 with your payroll dept.

STEPHEN KEEFE
PO BOX 726
GREEN HARBOR MA 02041

Social Security Number: 033-42-9252
Taxable Marital Status: MARRIED
Exemptions/Allowances:
FEDERAL: 2
STATE: 2

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— Fold and Detach Here —



1	Wages, tips, other comp.	2	Federal income tax withheld
	19435.74		3267.74
3	Social security wages	4	Social security tax withheld
	19435.74		1205.02
5	Medicare wages and tips	6	Medicare tax withheld
	19435.74		281.82
7	Control Number	8	Employer use only
	043537, HCK		1001
9	Employer's name, address, and ZIP code	10	Employer's name, address, and ZIP code
JOHN T CLARK & SON OF BOSTON BOSTON FISH PIER STE 301 BOSTON MA 02210		Batch #00539	
11	Employer's FED ID number	12	Employer's SSA number
	04-2203684		033-42-9252
13	Social security type	14	Allocated tips
	8		
15	Advance EIC payment	16	Dependent care benefits
17	Nonqualified plans	18	See instructions for box 12
19	Other	20	Stat emp. plan 3rd party sick pay
e/f Employee's name, address and ZIP code			
STEPHEN KEEFE PO BOX 726 GREEN HARBOR MA 02041			
21	State	22	State wages, tips, etc.
	MA		19435.74
23	State income tax	24	Local wages, tips, etc.
	1005.17		
25	Local income tax	26	Locality name

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Employee Reference Copy
W-2 Wage and Tax Statement 2001
OMB No. 1545-0048

2001 W-2 and EARNINGS SUMMARY

FBI

This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

1. The following information reflects your final 2001 pay stub plus any adjustments submitted by your employer.

Gross Pay	19435.74	Social Security Tax	205.02	MA State Income Tax	1005.17
Fed. Income Tax Withheld	3267.74	Medicare Tax Withheld	281.82	Box 17 of W-2	
Box 2 of W-2		Box 6 of W-2		Box 14 of W-2	

2. Your Gross Pay Was Adjusted as follows to produce your W-2 Statement.

Wages, Tips, other Compensation	Social Security Wages	Medicare Wages	MA State Wages, Tips, Etc.
Box 1 of W-2	Box 3 of W-2	Box 5 of W-2	Box 16 of W-2
19,435.74	19,435.74	19,435.74	19,435.74
Box 1 of W-2	Box 3 of W-2	Box 5 of W-2	Box 16 of W-2
19,435.74	19,435.74	19,435.74	19,435.74

Gross Pay
Reported W-2 Wages

3. Employee W-4 Profile. To change your Employee W-4 Profile Information, file a new W-4 with your payroll dept.

STEPHEN KEEFE
PO BOX 726
GREEN HARBOR MA 02041

Social Security Number: 033-42-9252
Taxable Marital Status: SINGLE
Exemptions/Allowances:
FEDERAL: 0
STATE: 0

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1 Wages, tips, other comp. 76362.00	2 Federal income tax withheld 10421.55
3 Social security wages 76362.00	4 Social security tax withheld 4734.44
5 Medicare wages and tips 76362.00	6 Medicare tax withheld 1107.25
a Control Number 001007 STJ	Dept. A
c Employer's name, address, and ZIP code JOHN T CLARK & SON OF BOSTON PO BOX 290573 CHARLESTOWN MA 02129	
Batch #00475	
b Employer's FED ID number 04-2203684	d Employer's SSA number 033-42-9252
7 Social security tips	8 Allocated tips
9 Advance EIC payment	10 Dependent care benefits
11 Nonqualified plans	12a See instructions for box 12
14 Other	12b
	12c
	12d
e Employer's name, address and ZIP code STEPHEN KEEFE PO BOX 726 GREEN HARBOR MA 02041	
15 State Employer's state ID no. MA 042-203-68409*	16 State wages, tips, etc. 76362.00
17 State income tax 3610.23	18 Local wages, tips, etc.
19 Local income tax	20 Locality name

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W-2 Employee Reference Copy
Wage and Tax Statement
2002
Copy C for employee's records. DMB, No. 1545-0008

2002 W-2 and EARNINGS SUMMARY



This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

The following information reflects your final 2002 pay stub plus any adjustments submitted by you, employer.

Gross Pay	76,362.00	Social Security Tax Withheld	4,734.44	MA State Income Tax	3,610.23
Federal Income Tax Withheld	10,421.55	Medicare Tax Withheld	1,107.25	SUBTOTAL	
Box 2 Box W-2		Box 6 Box W-2		Box 17 Box W-2	

2. Your Gross Pay Was Adjusted as follows to produce your W-2 Statement:

Gross Pay	76,362.00	Wages, Tips, Other Compensation	76,362.00	Social Security Wages	76,362.00	Medicare Wages	76,362.00	MA State Wages, Tips, Etc.	76,362.00
Reported W-2 Wages		Box 1 Box W-2		Box 3 Box W-2		Box 5 Box W-2		Box 16 Box W-2	

3. Employee W-4 Profile: To change your Employee W-4 Profile Information, file a new W-4 with your payroll dept.

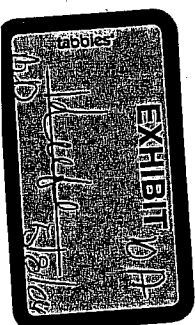
STEPHEN KEEFE
PO BOX 726
GREEN HARBOR MA 02041

Social Security Number: 033-42-9252
Taxable Marital Status: MARRIED
Exemptions/Allowances:
FEDERAL: 2
STATE: 2

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1 Wages, tips, other comp.	6444.55	2 Federal income tax withheld	1032.26
3 Social security wages	6444.55	4 Social security tax withheld	399.56
5 Medicare wages and tips	6444.55	6 Medicare tax withheld	93.45
a Control Number	100	Comp. Employer use only	118
c Employer's name, address, and ZIP code JOHN T CLARK, & SON OF BOSTON PO BOX 290573 CHARLESTOWN MA 02129			
Batch #00571			
b Employer's FED ID number	04-2203684	d Employee's SSA number	033-42-9252
7 Social security type	8 Allocated type		
9 Advance EIC payment	10 Dependent care benefits		
11 Nonqualified plans	12a See instructions for box 12		
14 Other	12b	12c	12d
e Employee's name, address and ZIP code STEPHEN KEEFE PO BOX 726 GREEN HARBOR MA 02041			
15 State Employer's state ID no.	16 State wages, tips, etc.	6444.55	
MA 042-203-68409*	17 State income tax	18 Local wages, tips, etc.	315.43
19 Local income tax	20 Locality name		

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FAST! Use at www.irs.gov
Employee Reference Copy
W-2 Wage and Tax Statement
OMB No. 1545-0048

2002 W-2 and EARNINGS SUMMARY



This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

The following information reflects your final 2002 pay stub plus any adjustments submitted by your employer.

Gross Pay	6444.55	Social Security Tax Withheld	399.56	MA State Income Tax	93.45
Fed. Income Tax Withheld	1032.26	Medicare Tax Withheld	93.45	Box 17 of W-2	93.45
Box 2 of W-2		Box 6 of W-2		Box 14 of W-2	

2 Your Gross Pay Was Adjusted as follows to produce your W-2 Statement.

Wages, Tips, other Compensation	Social Security Wages	Medicare Wages	MA State Wages, Tips, Etc.
Box 1 of W-2	Box 3 of W-2	Box 5 of W-2	Box 16 of W-2
6,444.55	6,444.55	6,444.55	6,444.55
6,444.55	6,444.55	6,444.55	6,444.55

Gross Pay Reported W-2 Wages

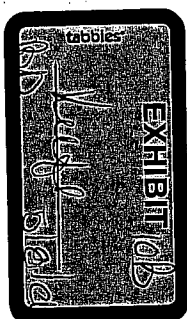
3. Employee W-4 Profile. To change your Employee W-4 Profile information, file a new W-4 with your payroll dept.

STEPHEN KEEFE
PO BOX 726
GREEN HARBOR MA 02041

Social Security Number: 033-42-9252
Taxable Marital Status: SINGLE
Exemptions/Allowances:
FEDERAL: 0
STATE: 0

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1	Wages, tips, other comp.	2	Federal income tax withheld
	15153.00		1717.29
3	Social security wages	4	Social security tax withheld
	15153.00		939.49
5	Medicare wages and tips	6	Medicare tax withheld
	15153.00		219.72
a	Control Number	Dept.	Comp.
	001007 46/STJ		T
c	Employer's name, address, and ZIP code	Batch #00788	
JOHN T CLARK & SON OF BOSTON PO BOX 290573 CHARLESTOWN MA 02129			
b	Employer's FED ID number	d	Employer's SSA number
	04-2203684		033-42-9252
7	Social security tips	8	Allocated tips
8	Advance EIC payment	10	Dependent care benefits
11	Nonqualified plans	12a	See instructions for box 12
14	Other	12b	
		12c	
		12d	
		13	Stat empl plan and party sick pay
			X
e/f Employee's name, address and ZIP code			
STEPHEN KEEFE PO BOX 726 GREEN HARBOR MA 02041			
15	State	16	State wages, tips, etc.
	MA		15153.00
17	State income tax	18	Local wages, tips, etc.
	684.48		
19	Local income tax	20	Locality name

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Employee Reference Copy
W-2 Wage and Tax **2003**
Statement OMB No. 1545-0008

Copy C for employer's records.

2003 W-2 and EARNINGS SUMMARY



This blue Earnings Summary section is included with your W-2 to help describe portions in more detail. The reverse side includes general information that you may also find helpful.

1. The following information reflects your final 2003 pay stub plus any adjustments submitted by your employer.

Gross Pay	15,153.00	Social Security Tax Withheld	939.49	MA State Income Tax Withheld	684.48
Fed Income Tax Withheld	1717.29	Medicare Tax Withheld	219.72	MA State Wages, Tips, Etc.	
Box 2 of W-2		Box 6 of W-2		Box 17 of W-2	

2. Your Gross Pay Was Adjusted as follows to produce your W-2 Statement.

Gross Pay	15,153.00	Wages, Tips, Other Compensation	15,153.00	Social Security Wages	15,153.00	Medicare Wages	15,153.00	MA State Wages, Tips, Etc.	15,153.00
Reported W-2 Wages		Box 1 of W-2		Box 3 of W-2		Box 5 of W-2		Box 16 of W-2	

3. Employee W-4 Profile. To change your Employee W-4 Profile information, file a new W-4 with your payroll dept.

STEPHEN KEEFE
PO BOX 726
GREEN HARBOR MA 02041

Social Security Number: 033-42-9252
Taxable Marital Status: MARRIED
Exemptions/Allowances:
FEDERAL: 2
STATE: 2

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VOL. I
PAGES 1-124
EXHIBITS 1-20

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

* * * * *

STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL

LONGSHOREMEN'S ASSOCIATION,

AFL-CIO, ET. AL,

DEFENDANTS.

* * * * *

DEPOSITION OF STEPHEN KEEFE, taken on
behalf of the Defendants, pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Bernadette J. D'Alelio,
Notary Public and Court Reporter within and for
the Commonwealth of Massachusetts, at the
Offices of Mullen & McGourty, 52 Temple Place,
Boston, Massachusetts, on May 8, 2006,
at 10:01 a.m., as follows:

Page 42

1 Q. What do you recognize it to be?
 2 A. It's a letter from William Horahoa.
 3 Q. Who is William Horahoa?
 4 A. He is the president of John T. Clark
 5 or was the president of John T. Clark.
 6 Q. What is the date on the letter?
 7 A. May 24th, 2000.
 8 Q. Who is the addressee on the letter?
 9 To whom it may concern?
 10 A. Yes.
 11 Q. Now, in May of 2000, Mr. Horahoa
 12 indicated that "Mr. Keefe is employed by our
 13 company," meaning John T. Clark & Son, "on a
 14 casual basis as a longshoreman working at the
 15 Conley Container Terminal"; is that correct?
 16 A. Yes.
 17 Q. Earlier, when you said that your
 18 family was taking care of you, had your job
 19 duties or responsibilities or any of the work
 20 that you did at John T. Clark & Company at any
 21 time when you were getting money from them,
 22 ever change?
 23 A. At any time?
 24 Q. Yeah. Why don't I limit the

Page 43

1 question.
 2 From 2000 until 2003, did your job
 3 duties and responsibilities at John T. Clark &
 4 Son change?
 5 A. No. I was working out of the hall.
 6 MR. MAHONEY: So let's mark the
 7 W-2 from 2000 as the next exhibit from John
 8 T. Clark. Actually, there is two of them.
 9 For the record, we will do 8A as the
 10 76,362 one, and we'll do 8B as the 13,585 W-2
 11 from 2000.
 12 (Exhibit-8A and 8B, W-2s for
 13 2000; Exhibits-9A and 9B, W-2s
 14 for 2001; Exhibits-10A and 10B,
 15 W-2s for 2002, marked for
 16 identification.)
 17 MR. MAHONEY: For the record,
 18 Exhibit 1 contains three documents. One is the
 19 W-2 of John T. Clark & Son. 1A, which we are
 20 going to mark in a minute, is a W-2 from
 21 Columbia Coastal. And then 1C appears to be a
 22 copy of the amount of unemployment compensation
 23 that the plaintiff received in 2003.
 24 So let's mark 1B and 1C.

Page 44

1 (Exhibit-1B, W-2; Exhibit-1C,
 2 Unemployment Compensation, marked
 3 for identification.)
 4 BY MR. MAHONEY:
 5 Q. We've already talked about Exhibit 1.
 6 Let's talk about Exhibit 1B.
 7 What is that, sir?
 8 A. Unemployment--
 9 Q. A copy of unemployment compensation?
 10 A. -- compensation.
 11 Q. It appears you received more than
 12 \$19,000 from the Commonwealth for unemployment
 13 compensation; is that right?
 14 A. Yes.
 15 Q. You applied for that unemployment
 16 compensation as a result of being laid off?
 17 A. Yes.
 18 Q. Who were you laid off by?
 19 A. The union.
 20 Q. Did you have to list a specific
 21 employer?
 22 A. P&O Ports, I think.
 23 Q. When did you begin to collect
 24 unemployment compensation in 2003?

Page 45

1 A. I don't remember. I don't know what
 2 month or --
 3 Q. All right. Well, if you were
 4 suspended in March of '03, would it be fair to
 5 infer that you applied for unemployment
 6 compensation sometime after March of 2003; is
 7 that right?
 8 A. I would say yes, but I don't know. I
 9 don't know if that is the right date or not.
 10 Q. Well, let me try it this way.
 11 A. I would have to go back to my records
 12 and see.
 13 Q. What records are those?
 14 A. There is more stuff I have at home for
 15 unemployment.
 16 Q. You wouldn't have applied for
 17 unemployment if you were still working?
 18 A. No.
 19 Q. And you said a moment ago you applied
 20 for unemployment after your suspension from the
 21 union; is that right?
 22 A. I would say so, yes.
 23 Q. With regard to Exhibit 1C, Columbia
 24 Coastal, it looks like maybe you got a paycheck

12. (Pages 42 to 45)

DUNN & GOUDREAU

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